November 15, 2013

EX PARTE

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

> Re: Public Notice, *Wireline Competition Bureau Announces that the
> National Lifeline Accountability Database Will Begin Accepting
> Subscriber Data in December*, WC Docket No. 11-42, DA 13-2052
> (rel. Oct. 23, 2013)

Dear Ms. Dortch:

Please see the questions below concerning the National Lifeline Accountability Database (NLAD). At a meeting with the Commission staff on October 25 with USTelecom and others, staff asked USTelecom to submit questions that would be helpful for the Commission or USAC to answer, the answers to which would assist ETCs in the initial loading of information into the NLAD.[1] The questions below supplement written questions submitted as part of USTelecom's October 25 ex parte.[2] This letter is being submitted concurrently to USAC.[3]

General Questions

1.   What is the expectation of the functionality of the database if all carriers in a particular state are not able to load live subscriber data and/or conduct live transactions by the specified date? In particular, how would this affect duplicate resolution and/or prevention?

2.   How does the NLAD accommodate carriers with study area codes which cover more than one state? This may be particularly complicated if one of the states involved have opted out of the NLAD.

3.   During the testing and migration process, what are USAC's plans for communicating with participating ETCs and for ETCs to contact USAC? Based on experience to date, questions to NLAD test e-mail do not receive prompt answers and are sometimes not answered at all. A much more robust and real-time communications process will be necessary for the migration and testing process to succeed.

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[1] *See ex parte* letter of David Cohen, USTelecom, in the above-referenced docket (filed October 29, 2013).
[2] Id.
[3] It would be helpful if USAC addressed these questions in its slide presentation for its webinar scheduled for November 20, 2013.

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Questions About Testing

1.   The Batch File portal is limited to 3MB during testing – this requires multiple files for each SAC if the SAC happens to be a large SAC (about 10,000 records per file). Will the "live" NLAD be modified to accept larger batch files?

2.   The error report for "P/M address fails AMS check" needs more definition. Will more information be provided for these errors?

> o   Examples:
>
> > ☐   Zip Code not found
> > ☐   City not recognized
> > ☐   Street address not found
> > ☐   No apt/unit recognized at that address
>
> o   Can a different error be returned if the address is valid but not served by the USPS versus if the AMS software found the address to be invalid?

Questions About the Exception Resolution Process:

1.   When will the details for the exception process be available (i.e., whom do we contact when we find an exception and what type of documentation will be required)?

2.   USAC has not provided any details regarding the data characteristics of the Resolution ID. Is it numeric or alphanumeric? How many characters will it contain?

3.   USAC has not provided any details regarding the placement of the Resolution ID in the error file that will be returned. This information is required for IT programming.

Questions About the Duplicate Resolution Process

1.   When will the duplicate resolution process be conducted on the embedded base of exiting subscribers? There is no indication of this in the schedule or webinar information. Will the process be exactly the same process used for the state-by-state IDVs? If not, how will it be different?

2.   Will USAC notify the carriers prior to sending out letters to customers?

> o   Will carriers have an opportunity to correct records prior to customer contact?
>
> o   Carriers may be able to add additional information such as IEH confirmation via a household worksheet.

3.   Will "duplicate customers" be loaded into production NLAD or held in an error database? If these customers are held in an error database, how will USAC handle updates that need to be made to these accounts while they are in the error database?

4.   How will carriers be notified that a duplicate customer has been cleared and loaded into production NLAD?

5.   How will carriers be notified that a duplicate customer should be de-enrolled?

6.   The duplicate resolution process needs to be clearly defined.

Questions About the Transfer Process

1.   What does the transfer process look like?

2.   What will notifications look like?

3.   How will notifications occur?

4.   Will customers receive notice from USAC that their Lifeline benefits are being terminated with the losing carrier?

Questions About the Benefit Qualifying Person

1.   Q21 in the FAQs available on USAC's website states "If an eligibility code is used that is associated with a Benefit Qualifying Person (BQP), the Benefit Qualifying Person's last name is required to be provided as a minimum. All other BQP fields are optional."

- o   None of the BQP information is listed anywhere in the Reform Order as being required information for the NLAD. After lengthy discussion of what information should be provided in the "subscriber" fields, including contacting the FCC because we were surprised since the BQP information was not required for the NLAD, we have not stored the BQP information in our systems.

- o   Under what authority is USAC requiring the BQP field?

This letter is being filed electronically pursuant to Section 1.1206 of the Commission's rules.

Please contact me if you have any questions.

Respectfully submitted,

David B. Cohen
Vice-President, Policy

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